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September 22, 2021

VIA ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: Moore, et al. v. Rubin, et al., 1:17-cv-06404 (BMC)

Dear Judge Cogan:

The defendants respectfully submit this letter to seek guidance from the Court as to the likelihood that the November 8, 2021, jury selection date, and the November 15, 2021, trial date, will be moved. We are preparing for trial, and we do not want to impose unnecessary costs on our clients if it is likely that the dates will be moved on account of the Court's schedule or on account of conditions caused by the pandemic.

We have shared the above paragraph with the plaintiffs, who requested that we include the following:

While Plaintiffs did not oppose submission of this letter, they ask that the Court be aware that all Plaintiffs are prepared for the Court's scheduled trial dates and have made arrangements with family and work in order to travel, have adequate childcare, and be available.

Respectfully,

/s/ Edward A. McDonald

Edward A. McDonald

cc: All Counsel of Record (via ECF)